



EMPLOY MILWAUKEE POLICY

POLICY: 17-03, CHANGE 3

SUBJECT: YOUTH INCENTIVES WIOA

ISSUANCE DATE: 11/20/25

EFFECTIVE DATE: 11/20/25

REVIEWED DATE: 08/27/26

REFERENCES:

- 20 CFR 681.640
- 2 CFR Parts 200 and 2900 United States Department of Labor Training and Employment Guidance Letter (TEGL) WIOA 21-16
- 81 FR 56186 and TEGL 21-19, p. 10
- Wisconsin WIOA Titles I-A and I-B Policy and Procedure Manual Chapter 10.6, Rev. September 4, 2018 Wisconsin Workforce Innovation and Opportunity Act (WIOA) Policy Update 16-01: Youth Incentive Awards Payment Policy

POLICY SCOPE

- ☐ EMPLOY MILWAUKEE AGENCY
- ☐ WIOA WDA 2 SYSTEM
- ☒ WIOA TITLE I-B PROGRAM(S)
 - ☐ ADULT PROGRAM
 - ☐ DISLOCATED WORKER PROGRAM
 - ☒ YOUTH PROGRAM
- ☐ NON-WIOA PROGRAMS
- ☐ RE ENTRY PROGRAMS

I. BACKGROUND

WIOA permits incentive payments to participants of the WIOA Title I-B Youth Program for “recognition and achievement directly tied to training activities and work experiences” (20 CFR 681.640). Incentives must comply with the Cost Principles in 2 CFR Part 200.

II. PURPOSE

This policy outlines the policy and procedures that govern the use of incentives in Workforce Development Area (WDA) 2’s WIOA Title I-B Youth Program.

III. POLICY

A. Required Predecessors

Employ Milwaukee offers reasonable incentives to youth participants in recognition for achievement in their WIOA Title I-B Youth Program training, education, and work experiences. For the purposes of this policy, the term “incentive award payment” shall mean a reward intended to recognize the achievement of a training activity or work experience, which can help motivate a youth to set and then achieve a training activity or work experience goal.

The justification for awarding incentives must be tied to the goals in the youth’s WIOA Individual Service Strategy (ISS) and outlined in writing before the commencement of the service. Incentive award payments shall be made in a uniform and consistent manner that ensures all participants receive equal rewards for equal achievement.

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B. Limitations

All incentive award payments are subject to the availability of WIOA funds and are not an entitlement. Employ Milwaukee may suspend or withdraw authorization for incentive award payments at any time and at its sole discretion.

Youth incentive award payments are limited to a maximum amount of \$500 per eligible youth per program year and are to be processed through a Youth Incentive Form and tracked in Employ Milwaukee's ETO System and funder mandated system(s).

Participants may not receive multiple incentive payments for the same activity.

Incentive requests must be submitted to Employ Milwaukee within one month of the youth's achievement. Any exceptions to this requirement are made at the sole discretion of Employ Milwaukee Management.

C. Allowable Activities

Goals and/or training outcomes eligible for an incentive must be linked to an achievement directly tied to training, education, or work experience as stated in the clients' Individualized Service Strategy (ISS) and documented in accordance with applicable WIOA regulations.

EMI may use WIOA funds for incentive payments to in-school youth (ISY) and out-of-school youth (OSY) participants to recognize achievement of program milestones directly tied to work experience, education, or training. Program milestones include but are not limited to:

- attaining a credential
- achieving a certain grade point average
- graduating from secondary school or an equivalent program
- completing a work experience
- entering unsubsidized employment
- being accepted into a post-secondary school, and
- showing improvements marked by testing

Attachment A clearly identifies the types of program milestones that qualify for incentive payments and award amount(s) and specifies any limitations.

IV. PROCEDURES

A. Documentation of Justification and Receipt

Incentives are available to each WIOA eligible youth participant based on need documented in the participant's ISS. WIOA Title I service providers shall maintain required documentation detailing the distribution and management of awards. All incentives are taxable at the full amount of the award and subject to withholding in accordance with Internal Revenue Service (IRS) regulations.

Employ Milwaukee shall require all WIOA service providers and grantees receiving funds from a grant or contract administered by Employ Milwaukee to comply with this policy and applicable procedures. At a minimum, service providers shall:

1. Document the need for the incentive and justify issuance of the award in the participant's ISS and in the case notes in the funder mandated system(s).
2. Request the incentive by submitting a Youth Incentive Checklist form and supporting documentation to Employ Milwaukee.
3. Employ Milwaukee Program Specialist reviews and approves valid requests.
4. Career Planner must maintain all records relating to the incentive, including documentation substantiating the achievement meriting an incentive in the participant's paper file.

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B. Procurement

The procurement of non-cash incentives must follow standard procurement procedures as stipulated in 2 CFR §200.318 - 320.

C. Quality Assurance

Each service provider must remain aware of all applicable regulations and monitor personnel and client activities to ensure compliance. Employ Milwaukee shall review service provider compliance with this policy during monitoring.

V. ACTION REQUIRED

- Posting of this Policy to the Employ Milwaukee website for open access to all personnel.
- WIOA Title I-B Service Providers in WDA 2 must share this policy with Career Planners and other WIOA staff immediately.
- All incentive payments made following this policy's effective date must meet the local requirements and follow prescribed procedures described herein.
- Posting of this Policy to the Employ Milwaukee website for open access to all personnel.

RECISSIONS: [Policy 17.02 Change 2 Youth Incentives](#)

BOARD APPROVAL DATE: [11/20/2025](#)

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Note: ASSET should be interpreted as the funder mandated system

Attachment A - Allowable Incentive Payments Levels: 1-\$25, 2-\$50, 3-\$75, 4-\$100 Please refer to the WIOA Policy & Procedure Manual, Chapter 10.6 - Youth Incentive Payments							
Type of Milestone	Notes on Conditions when Allowable	Associated Service(s)	Example Documentation	Incentive Payment	Where does this align with program? Enrollment, Program Element, Partner Program Participation, or Follow-Up	Guidance/How/When	Performance Indicator Impacted
1. Attain High School Diploma	Allowable	- Non WIOA Funded Secondary Education - Tutoring, Study Skills Training, Dropout Prevention	Copy of diploma or transcript showing graduation	4	- Program Element - Partner Program Participation	After receipt of documentation supporting completion of High School	CAR & MSG
2. Attain GED/HSED	Allowable	- Alternative Secondary School or Dropout Recovery Services - Non WIOA Funded Secondary Education - Adult Basic Education - Tutoring, Study Skills Training, Dropout Prevention	Copy of GED/HSED or transcript showing graduation	4	- Program Element - Partner Program Participation	After receipt of documentation supporting attainment of GED/HSED	CAR & MSG
3. Pass a Component of the GED Test	Allowable	- Alternative Secondary School or Dropout Recovery Services - Non WIOA Funded Secondary Education - Adult Basic Education - Tutoring, Study Skills Training, Dropout Prevention	Copy of official document showing passing score	2	- Program Element - Partner Program Participation	After receipt of satisfactorily completed section of GED	CAR & MSG
4. Achieve a "Likely to Pass" Score on a GED Practice Test	Allowable	- Alternative Secondary School or Dropout Recovery Services - Non WIOA Funded Secondary Education - Adult Basic Education - Tutoring, Study Skills Training, Dropout Prevention	Copy of practice test results	1	- Program Element - Partner Program Participation	After receipt of Satisfactory progress report	CAR & MSG
5. Return to Secondary School	Allowable for out-of-school youth within compulsory attendance age. Not allowable for in-school youth.	Non WIOA Funded Secondary Education	Copy of official document from the secondary school showing the participant is enrolled in and attending school	3	Partner Program Participation	Enrollment/starting secondary education	CAR & MSG
6. Secondary School Attendance	Allowable if out-of-school youth within compulsory attendance age returns to school and remains. Local WDBs may set timeframe - semester, school year, etc. Not allowable for in-school youth.	Non WIOA Funded Secondary Education	Copy of report card or other official document from the secondary school showing participant's school attendance	3	Partner Program Participation	After receipt of report card	CAR & MSG
7. Achieve Post-Secondary Certificate or Degree Allowable		- Occupational Skill Training - Education Offered Concurrently with Workforce Preparation Activities - Non WIOA Funded Post-Secondary Education - Apprenticeship	Copy of diploma/certificate or transcript	4	- Program Element - Partner Program Participation	After receipt of certificate or degree	CAR & MSG
8. Application to Post-Secondary School	Allowable. Post-secondary training or education does not have to be started or completed, but must be planned.	Activities Helping Youth Transition to Post-Secondary Education and Training	Copy of letter confirming application or confirming acceptance/denial of admission	1	Program Element	After receipt of letter	CAR & MSG
9. Completion of FAFSA (Free Application for Federal Student Aid) or other financial aid application	Allowable if post-secondary education or training is planned; education or training does not have to be started or completed.	Activities Helping Youth Transition to Post-Secondary Education and Training	Copy of notification of receipt or submission	1	Program Element	After receipt of submission	Post Secondary
10. Enrollment in Post-Secondary School	Allowable. Post-secondary training or education does not have to be started or completed, but must be planned.	Activities Helping Youth Transition to Post-Secondary Education and Training	Copy of course schedule	2	Program Element	After enrollment completed	Post Secondary
11. Completing a Résumé	Allowable	- Work Experience: Internship - Work Experience: School Year Employment - Work Experience: Summer Employment Opportunities	Copy of completed résumé or ASSET WIOA Title III proof of completion	1	Program Element	After service completed and copy received	Employment
12. Completing a Job Application	Allowable	- Work Experience: Internship - Work Experience: School Year Employment - Work Experience: Summer Employment Opportunities	Copy of notification from employer of application receipt or ASSET WIOA Title III proof of completion	1	Program Element	After receipt of employer notification/proof of completion	Employment
13. Completing an Informational Interview	Allowable	Career Awareness, Exploration, and Counseling	Copy of documentation from employer or company confirming interview completion	1	Program Element	After interview receipt received	Enrollment
14. Completing Job Shadow	Allowable	Work Experience: Job Shadowing	Copy of letter on company letterhead regarding the participant's completion of a job shadow activity.	1	Program Element	After Program Element completed and verified by employer	Enrollment
15. Completing objective assessment	Allowable	Career Awareness, Exploration, and Counseling	Copy of completed assessments	2	Program Element	After completion of assessment	Enrollment
16. Obtaining Unsubsidized Employment	Allowable	Any service that leads to the participant obtaining unsubsidized employment during the period of participation	Pay stub(s) or letter of hire	3	Program Element	After receipt of pay stub	Employment
17. Retaining Unsubsidized Employment	Allowable- 2nd Quarter after Exit	Any service that leads to the participant retaining unsubsidized employment during the period of participation	Pay stub(s)	3	Follow-Up	After receipt of pay stub	Qtr 2 Retention
18. Developing a Resource Plan for Addressing Barriers	Allowable if the plan addresses barriers to training or employment, related to supportive services (e.g., childcare, transportation, etc.)	Any training, education, or work experience	Copy of plan	1	Program Element	Copy of signed Individual Service Strategy identifying program elements addressing barriers.	Supportive Services
19. Completing Community Service/Volunteer Hours	Allowable. Local WDBs may specify that community service cannot be court ordered or required by school.	- Work Experience: Internship - Activities Helping Youth Transition to Post-Secondary Education and Training	Copy of letter on company letterhead that confirms the participant's completion of a community service/volunteer activity	2	Program Element	After receipt of confirmation letter	Work Experience

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20. Entrepreneurial Training or Planning	Allowable if business ownership is a goal identified on the participant's ISS	Entrepreneurial Skills Training	Completed business plan or similar achievement produced during entrepreneurial training.	2	Program Element	Copy of Business Plan developed during Entrepreneurial Skills Training	Entrepreneurial
21. Basic Certifications	Allowable if the certification is required for a training or work experience service. This includes CPR/First Aid, OSHA 10, Job Safety Training.	Any training or work experience	Copy of certification with case notes/ISS explaining what requirement the certification fulfills	1	Program Element	After receipt of certification along with signed ISS identifying the requirement	MSG
22. Achievement of National Career Readiness Certificate (NCRC) at bronze level or higher	Allowable if tied to work experience	Any work experience	Copy of NCRC certificate or ASSET WIOA Title III proof of completion	2	Program Element	After receipt of the certificate	CAR
23. Study Skills Improvement	Allowable if tied to an education or training service	Tutoring, Study Skills Training, Dropout Prevention	Pre- and post-tests showing improved study skills or other documentation showing measurable improvement	2	Program Element	After receipt of pre and post test or report card showing measurable improvement	MSG
24. Apprenticeship Achievements	Allowable for attaining an apprenticeship milestones-completing a year or the entire apprenticeship	Work Experience: Pre-apprenticeship Programs	Copy of journeyman card or other official documentation showing achievement of registered apprenticeship milestones; for Youth Apprenticeship participants, proof of registration as a Youth Apprentice or the Youth Apprenticeship completion certificate (Certificate of Occupational Proficiency)	4	Program Element	After receipt of official documentation	CAR/MSG
25. Achieve a Basic Skills Level Increase	Allowable if a training service occurred. This does not require being basic skills deficient. See column G for allowable guidance.	- Alternative Secondary School or Dropout Recovery Services - Non WIOA Funded Secondary Education - Adult Basic Education - Tutoring, Study Skills Training, Dropout Prevention - Occupational Skill Training	Copies of pre- and post-tests	2	- Program Element - Partner Program Participation	Basic skill progression of at least 1 National Reporting System (NRS) level	MSG
26. Completing a Work Experience	Allowable	Work Experience: Employment Opportunity Work Experience: On-the-Job Training Work Experience: Pre-apprenticeship Programs	Copy of letter on company letterhead regarding the participant's completion of the work experience.	4	Program Element	After receipt of employer notification/proof of completion	Work Experience